

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	Case No. 17-cr-00134 (WMW-DTS)
)	
Plaintiff,)	MOTION TO AUTHORIZE
)	ADDITIONAL COUNSEL
v.)	
)	
John Kelsey Gammell,)	
)	
Defendant.)	
)	

Defendant John Kelsey Gammell moves for an order authorizing the appointment of additional counsel on this case.

This matter is scheduled for trial early in February 2018. The government filed a superseding indictment on November 8, 2017, adding additional charges and counts. This is a novel case, one that involves allegations of cybercrime and identity theft under statutes Mr. Gammell challenges for constitutionality. The subject matter of the case and facts have required and do require a substantial amount of work. On October 24, 2017, the government added additional counsel, Aaron Cooper, from the Computer Crimes & Intellectual Property Section. Up to this point, the undersigned has litigated as a solo attorney but is now requesting that co-counsel be appointed. The Federal Defender's Office has agreed that this case warrants such a request and has advised that if the Court authorizes additional counsel, Robert D. Richman will be appointed to this case.

Dated: November 20, 2017

By s/Rachel K. Paulose

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